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April 5, 2020

BY ECF

Honorable William H. Pauley III
United States District Judge
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *United States v. Osborne, et al.*, 19 Cr. 931 (WHP)

Dear Judge Pauley:

I am the attorney for Lywan Reed, a defendant in the above-referenced matter. With the consent of the Government and Pre-Trial Services, I write to request modification of Mr. Reed's bail conditions, which includes a condition of home detention with electronic monitoring. I request that the location of Mr. Reed's home detention be transferred from his current residence at 31-38 51st St., Apt. 1D, Queens, NY 11377, where he resides with his friend, Kanisha McLaren, to the residence of his mother, Denise Vaughan, at 500 Mother Gaston, Apt. 6B, Brooklyn, NY 11212. Mr. Reed's mother is a surety who signed his bond. At the time Mr. Reed's bail conditions were imposed, his mother was in the process of obtaining her apartment. She has now settled in and has the ability to have Mr. Reed live with her, which we believe will be a better and more supportive living situation for him. I have spoken with both Bernisa M. Mejia, Mr. Reed's Pre-Trial Services Officer, and Assistant United States Attorney Rebecca Dell, who both advise that they have no objection to this request.

I thank the Court for its consideration.

Respectfully submitted,

/s/

Renato C. Stabile

Application granted.

SO ORDERED:


WILLIAM H. PAULEY III
U.S.D.J.

April 6, 2020